

CRIMINAL COMPLAINT

NEGLIGENT HOMICIDE AND CIVIL RIGHTS VIOLATIONS

RESULTING IN THE DEATH OF JAYDEN MCNABB

TO: Douglas County Sheriff, Nebraska State Patrol, FBI Omaha Field Office, U.S. Attorney's Office

FROM: Justin Riddle, Complainant and Witness

DATE: June 25th, 2025

SUBJECT: Formal Criminal Complaint - Death of Minor Resulting from Government Harassment

EXECUTIVE SUMMARY

This complaint formally requests criminal investigation into the death of Jayden McNabb, a Nebraska teenager who died in January 2024 as a direct result of systematic harassment by Omaha Public Schools (OPS) and Omaha Police Department (OPD). The harassment was conducted without legal basis, targeted a minor for exercising First Amendment rights, and directly caused the psychological deterioration that led to his death.

The evidence shows:

- Police harassment of a high school student with no criminal conduct
- Recorded admission by officers that no crime was committed
- Coordinated targeting between OPS and OPD to intimidate citizens
- Foreseeable psychological harm leading to death
- Pattern of civil rights violations affecting multiple citizens

CRIMES COMMITTED

1. NEGLIGENT HOMICIDE (Neb. Rev. Stat. § 28-305)

Elements: Reckless conduct causing death of another **Evidence:** Defendants recklessly harassed a minor knowing it would cause psychological harm

2. CONSPIRACY TO VIOLATE CIVIL RIGHTS (18 U.S.C. § 241)

Elements: Two or more persons conspiring to injure rights secured by Constitution **Evidence:** OPS and OPD coordinated to suppress First Amendment rights of citizens

3. DEPRIVATION OF RIGHTS UNDER COLOR OF LAW (18 U.S.C. § 242)

Elements: Acting under color of law to deprive constitutional rights **Evidence:** Police harassment without legal justification, targeting protected speech

4. CHILD ENDANGERMENT (Neb. Rev. Stat. § 28-707)

Elements: Knowingly placing child in situation endangering physical/mental health **Evidence:** Targeting minor with psychological harassment causing mental health crisis

THE VICTIM: JAYDEN MCNABB

Jayden McNabb was an intellectually sharp Nebraska high school student who had never been in trouble until December 2020, when he was suspended for a mask violation - not pulling his mask up "fast enough between bites" while eating at a table 15 feet from other students.

This arbitrary punishment had such a profound impact that eight months later, in August 2021, Jayden sought out Justin Riddle after researching who was effectively challenging the school system's abusive policies. Of all the citizens who could have connected with Riddle's advocacy, it was this bright, politically aware teenager who recognized the need for institutional accountability.

Jayden became a dedicated advocate for government transparency, attending multiple school board meetings and even speaking publicly after his graduation when he was no longer constrained as a student. He helped edit videos exposing institutional misconduct and demonstrated a sophisticated understanding of the systematic problems within OPS.

His only "offense" that triggered police harassment was:

- Attending a public school board meeting to observe (did not speak)
- Sitting next to Justin Riddle while wearing a mask
- Exercising his First Amendment right to attend public meetings
- Supporting transparency and accountability in government

In January 2024, Jayden McNabb died as a result of ongoing mental health struggles, at least in part related to his disillusionment with governmental institutions and the systematic corruption he had witnessed. This tragic outcome represents the predictable consequence of institutional

harassment and the destruction of civic trust in a young person who had sought justice through proper channels.

THE HARASSMENT CAMPAIGN

Initial Targeting

In approximately late August/early September, Jayden attended an Omaha Public Schools board meeting. He:

- Did not speak during public comment
- Wore a mask (making identification difficult)
- Simply sat in the audience next to Justin Riddle
- Committed no crime or violation

Police Response

Despite no criminal conduct, OPS contacted OPD to target Jayden. The harassment included:

- Police calling his home the same night as the meeting
- Officers visiting his residence the following day to question his parents
- Requesting permission to search his bedroom without warrant or probable cause
- Interrogating family members about his political associations
- Treating attendance at a public meeting as suspicious activity

Notably, Jayden was not even present during the police visit to his home, yet the intimidation of his family and the threat of searching his personal space created the intended chilling effect on his constitutional rights.

Recorded Evidence

The next day, Lieutenant Charles Ott of OPD contacted Justin Riddle. During this recorded conversation, Lt. Ott admitted:

"I wasn't hoping to find anything" - when asked what he was searching for **"that's a normal investigative technique when you are investigating potential threats"** - despite admitting no threat existed **"amongst groups of people with Anonymous Twitter pages that's it"** - the only "evidence" was political association **"no one said anything [illegal]"** - admission no crime was committed

This recorded admission proves:

1. No criminal activity justified police contact
2. The "investigation" was pretextual harassment
3. Jayden was targeted for political association

4. Officers knew their conduct lacked legal basis

Continued Fighting for Accountability

Despite the harassment and systematic obstruction, Jayden never gave up his pursuit of justice. On September 10, 2023 - just four months before his death - he filed public records requests with both the City of Omaha and Omaha Police Department seeking documentation of the very phone conversation where Lt. Ott admitted the harassment was baseless.

Specifically, Jayden requested records of conversations between Officer Stephen Lee (head of OPD's Mental Health and Wellness Department) and Justin Riddle. This request targeted evidence of additional harassment where mental health services were weaponized against a citizen for exercising First Amendment rights.

The agencies' responses demonstrate continued obstruction and outright lies:

- **City of Omaha:** Standard bureaucratic delays and runaround procedures
- **OPD: Falsely claimed "no 'Steve' in our Behavioral Health and Wellness Unit"** despite Stephen Lee being the department head
- **OPD:** Invoked law enforcement exemptions to conceal their own misconduct

This constitutes perjury and obstruction of justice. Officer Stephen Lee exists, heads the Mental Health and Wellness Department, and personally confirmed to Riddle in a 2023 conversation that he remembered the original harassment call and the circumstances surrounding it. OPD's denial of his existence in response to Jayden's records request represents a deliberate lie to obstruct a legitimate investigation.

Jayden's response to these obstructionist tactics showed his continued sharp analysis: "I don't watch the nightly news often but I know they report on actual news" - recognizing that real journalism would expose their lies.

This timeline proves Jayden's dedication to transparency and accountability continued until his final months, making his death even more tragic - they killed someone who never stopped fighting for justice through proper legal channels, and they lied to him about basic facts even in his final records requests.

CAUSATION: HARASSMENT TO DEATH

Timeline of Deterioration

- **2021:** Police harassment occurs
- **2021-2023:** Jayden exhibits signs of depression and social withdrawal
- **Late 2023:** Communication with support systems diminishes
- **January 2024:** Jayden dies during mental health crisis

Documented Warnings

During the recorded call, Justin Riddle specifically warned Lt. Ott:

- "that's harassment" - identifying the illegal conduct
- "going to somebody's house and asking to look at something that you don't even know what you're looking for... that's intimidating that's intimidating a child"
- Predicted the psychological damage would occur

These warnings establish foreseeability - defendants were explicitly told their conduct would harm the child.

Direct Causation

The harassment campaign contributed significantly to Jayden's death by:

1. Destroying his faith in institutions meant to protect him
2. Creating lasting psychological trauma from being treated as a criminal for exercising constitutional rights
3. Demonstrating that even citizens with resources and legal victories (like Riddle's Supreme Court success) cannot obtain justice against systematic corruption
4. Showing him that no institutional accountability would result from citizen advocacy - despite attending multiple meetings and witnessing extensive documentation of violations, no reforms or consequences ever materialized
5. Contributing to long-term mental health deterioration and disillusionment with governmental systems

The systematic destruction of hope - watching coordinated institutional corruption defeat even the most qualified advocates while producing zero accountability or reform - represents a predictable pathway to psychological harm, particularly for young people who have not yet developed resilience against such comprehensive institutional betrayal.

PATTERN OF SYSTEMATIC INSTITUTIONAL CORRUPTION

This is not an isolated incident but part of a documented pattern spanning multiple years and agencies. The evidence shows unprecedented coordination across Nebraska institutions to suppress constitutional rights and avoid accountability.

The Comprehensive Corruption

Complainant has compiled over 91,000 words of documentation (300+ pages) detailing systematic violations including:

- Judicial falsification of court records and creation of impossible procedural requirements
- Attorney General publication of demonstrably false statements and refusal to correct when confronted
- Coordinated appeals process fraud involving the Nebraska Supreme Court
- Systematic records suppression and obstruction by multiple agencies
- Pattern of targeting citizens for exercising First Amendment rights

The Hopelessness Factor

Jayden McNabb witnessed this entire pattern of corruption systematically defeat someone (Riddle) who had:

- Won against Charter West Bank at the Nebraska Supreme Court
- Documented every violation with recordings, emails, and evidence
- Forced 18 judges in the Fourth Judicial District to recuse themselves
- Obtained subpoenas compelling the Nebraska Attorney General to testify under oath
- Demonstrated sophisticated legal knowledge and resources

If someone with those qualifications and victories could still be systematically crushed by coordinated institutional lies and obstruction, what hope remained for a teenager?

This systematic destruction of hope in the possibility of justice represents a predictable pathway to psychological harm, particularly devastating for young people witnessing comprehensive institutional betrayal.

EVIDENCE TO BE PRESERVED/OBTAINED

Immediate Evidence Preservation Required:

1. All communications between OPS and OPD regarding Jayden McNabb
2. All communications between OPS and OPD regarding school board meetings
3. Police reports, incident reports, and logs related to Jayden McNabb
4. School disciplinary records for Jayden McNabb
5. All audio/video recordings of the harassment incidents
6. Email communications between OPS officials about targeting citizens

Witnesses to Interview:

1. Lieutenant Charles Ott (OPD) - admitted illegal harassment on recording
2. OPS officials who initiated police contact
3. Other citizens targeted for meeting attendance
4. Jayden's family members regarding his psychological deterioration
5. School personnel involved in his suspension

Physical Evidence:

1. Complete audio recording of Lt. Ott conversation
2. Death investigation records for Jayden McNabb
3. Medical records showing psychological deterioration
4. Communication records between complainant and victim

LEGAL AUTHORITY FOR INVESTIGATION

Federal Jurisdiction

- 18 U.S.C. § 241 (Conspiracy against rights) - Federal felony
- 18 U.S.C. § 242 (Deprivation of rights under color of law) - Federal felony
- Civil rights violations resulting in death - Federal jurisdiction established

State Jurisdiction

- Negligent homicide under Nebraska law
- Child endangerment under Nebraska law
- Official misconduct under Nebraska law
- Conspiracy under Nebraska law

URGENCY OF INVESTIGATION

Evidence Destruction Risk

- OPS has a documented history of destroying records
- Key witnesses may be influenced or intimidated
- Related litigation is ongoing, creating additional pressure to conceal evidence

Pattern Continues

- The same officials continue targeting citizens
- Other minors remain at risk
- The harassment campaign is ongoing and systematic

Public Safety

- Government agencies are operating without legal constraints
- Citizens' constitutional rights are under active attack
- The rule of law is being systematically undermined

CONCLUSION AND DEMANDS

Jayden McNabb was an intellectually gifted teenager who recognized institutional corruption and sought out an advocate capable of fighting it. He watched that advocate - someone with Supreme Court victories and overwhelming evidence - get systematically crushed by coordinated lies and obstruction across every level of Nebraska government.

The message was clear: if someone with those resources and qualifications couldn't obtain basic fairness, the system was hopeless.

This case represents more than government misconduct - it demonstrates how systematic institutional corruption creates predictable psychological harm, particularly for young people who have not yet developed defenses against such comprehensive betrayal of civic trust.

The documented evidence shows:

- Police harassment without legal basis (recorded admission)
- Coordinated institutional obstruction spanning years
- Pattern of defeating even qualified advocates through lies and procedural manipulation
- Foreseeable psychological harm to victims, especially minors
- Fatal outcome consistent with documented patterns of harm from government overreach

We demand:

1. **Immediate criminal investigation** of all parties involved in the harassment campaign
2. **Preservation of all evidence** related to the systematic institutional coordination
3. **Grand jury presentation** of the recorded admissions and documented violations
4. **Federal civil rights investigation** by the FBI Civil Rights Division
5. **Accountability** for the officials whose coordinated misconduct contributed to this preventable death

The evidence establishes probable cause for multiple felonies. More importantly, it demonstrates how systematic corruption kills hope - and without hope, vulnerable people die.

Jayden McNabb's death was preventable. It resulted from government officials who decided that a teenager attending a public meeting justified police harassment, despite having no legal basis and explicit warnings about psychological harm.

Justice delayed is justice denied. But for Jayden McNabb, justice denied became justice impossible - and that impossibility killed him.

His death can have meaning only if it prevents this systematic destruction of other young people who dare to believe in the possibility of government accountability.

Submitted under penalty of perjury,

Justin Riddle
Complainant and Witness
402-813-2156

Attachments:

- Audio recording of Lt. Ott conversation